

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

ROBERTO CLAROS, et al.,

Plaintiffs,

v.

SWEET HOME IMPROVEMENTS, INC.,  
et al.,

Defendants

Case No. 1:16-cv-344-AJT-MSN

**DEFENDANTS' RESPONSE TO MOTION FOR RULE TO SHOW CAUSE**

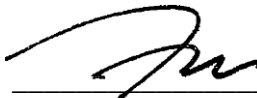
Defendants' Sweet Home Improvements, Inc., Myung K. Koo, and Mi Ae Koo, hereby submits this response to Motion for Rule to Show Cause from Roberto Claros, Jose Claros, Fredy Zamorano, Mario Herrera Macuran, and Osbaldo Lopez, and in support thereof states as follows:

1. Defendants have attempted to answer to the best of their ability all discovery requests by all six Plaintiffs.
2. Defendants are unable to comply with the present request for obtaining bank record due to problems with the bank when Defendants closed the account. Basically, there were disputes regarding fees charged by bank and they will not release any record unless these charges are resolved.
3. Defendants respectfully requests that the expense of obtaining the record is too burdensome and is unable to comply. Defendants respectfully requests that Plaintiffs have other means to obtain the records via subpoena.

4. Wherefore, Defendants respectfully request this Honorable Court to excuse them from compliance of this record request which had become overly burdensome.

SWEET HOME IMPROVEMENTS,  
MYUNG KOO, AND MIAE KOO

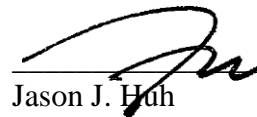
By Counsel



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**CERTIFICATE OF SERVICE**

On this August 3, 2016, I certify that a true copy of the foregoing **DEFENDANTS' RESPONSE TO RULE TO SHOW CAUSE FROM ROBERTO CLAROS, JOSE CLAROS, FREDY ZAMORANO, MARIO HERRERA MACURAN, AND OSBALDO LOPEZ** was emailed and mailed, postage prepaid, to the following individual: Nicholas Cooper Marritz, 6066 Leesburg Pike, Suite 520, Falls Church, VA 22041, nicholas@justice4all.org.



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Jason J. Huh